

Amendments to the Drawings:

The attached replacement drawing sheet includes changes to FIG. 1, which has been amended to include descriptive text for each “Communications Network”, the “Server”, each “interface”, the “RADIUS” and the “DNS”.

REMARKS

Claims Status

Applicant acknowledges, with appreciation, the allowance of claims 34-41. Claims 25-41 are now presented for examination, with claims 25 and 34 being in independent form.

The drawings have been amended. Claims 25-41 have been amended. Support for the amendments to independent claim 25 may be found, for example, at pg. 4, lines 12-16 and pg. 6, lines 4-7 of the specification as originally filed. The amendments to claims 26-41 clarify the wording of the claims, and are cosmetic in nature. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

Information Disclosure Statement

The Examiner has indicated he has not considered “Digital Cellular Telecommunications System (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); General Packet Radio Service (GPRS) Service Description; Stage 2 (3GPP TS 23.060 version 3.8.0 Release 1999)”, ETSI TS 123 060, V3.8.0, June 1, 2001, pgs. 134-135 (the “GSM Standard”) and has drawn a line through this reference on Form PTO/SB/08A to indicate it was not considered because it was not received.

However, MPEP § 609.03 states:

The examiner will consider the documents cited in the international search report in a PCT national stage application *when the Form PCT/DO/EO/903 indicates that both the international search report and the copies of the documents are present in the national stage file.* In such a case, *the examiner should consider the documents from the international search report and indicate by a statement in the first Office action that the information has been considered.* (Emphasis Added)

In the instant application, the Form PCT/DO/EO/903 that was returned to the undersigned on October 6, 2005 indicates that both the international search report and the copies

of the documents are present in the national stage file. As a result, it is respectfully requested that the Examiner consider all of the documents from the international search report, i.e., the GSM Standard.

In any event, in the interest of advancing prosecution on the merits, an Information Disclosure Statement (IDS) is being filed concurrently with the instant amendment which includes the GSM Standard. An acknowledgement of the receipt, entry and consideration of this IDS is respectfully requested. Because the GSM Standard reference should have been considered in accordance with MPEP §609.03, it is believed that no fee is required for the IDS. If the Examiner disagrees, however, it is respectfully requested that the fee be charged to our PTO deposit account.

Overview of the Office Action

The drawings have been objected to for certain informalities. Withdrawal of this objection is now in order.

Claims 25-33 stand rejected under 35 U.S.C. §103(a) as obvious over GB 2366705 (“*Shi*”) in view of U.S. Patent No. 6,654,607 (“*Shobatake*”).

Applicant has carefully considered the Examiner’s rejections and the comments provided in support thereof. For the following reasons, Applicant asserts that all claims now presented for examination in the present application are patentable over the cited art.

Amendments Addressing Formalities

The Examiner has stated that “figure 1 has boxes with no labels (other than numbering – the boxes/components should be clearly labeled such that the user does not have to consult the specification to understand what said boxes are)”. In response to this objection, applicant

submits herewith a replacement sheet containing FIG. 1, which has been revised to include descriptive text for each “Communications Network”, the “Server”, each “interface”, the “RADIUS” and the “DNS”. No new matter has been added. Entry of the replacement sheet is respectfully requested.

Descriptive Summary of the Prior Art

Shi relates to “a method of allocating an address to a mobile station operating in a wireless communication system in order to facilitate a communication link to a fixed communication system” (see Abstract).

Shobatake relates to “a system and method for communicating across various communications platforms” (see Abstract)

Summary of the Subject Matter Disclosed in the Specification

The following descriptive details are based on the specification. They are provided only for the convenience of the Examiner as part of the discussion presented herein, and are not intended to argue limitations which are unclaimed.

The specification discloses a system for managing access from a plurality of communications networks to a mobile terminal connected to a mobile telecommunications network. In accordance with the disclosed embodiments, the system is configured to set up at least one additional connection from at least one communications networks to the mobile terminal after the mobile terminal has sent a first command message to request identification of the mobile terminal from an application server to at least one domain name server located in at least one of the communications networks.

As a result, a second connection between the mobile terminal and the additional communications network is established without assigning a second address to the mobile terminal, because the mobile terminal is connected and already has an associated address that is identified and used for the additional connection.

Patentability of Independent Claims 25 under 35 U.S.C. §103(a)

Independent claim 25 has been amended to incorporate a feature from independent claim 34 -- which has been indicated to contain allowable subject matter. Specifically, independent claim 25 has been amended to recite the “system is configured to set up at least one additional connection from at least one of said communications networks to said mobile terminal after said mobile terminal has sent a first command message to request identification of said mobile terminal from an application server to at least one domain name server disposed in said communications network”. Support for this amendment may be found, for example, at pg. 4, lines 12-16 and pg. 6, lines 4-7 of the specification as originally filed. No new matter has been added.

The Examiner (at pg. 4 of the Office Action) acknowledged that *Shi* fails to teach or suggest “after verifying the authorization for receiving incoming calls given by the user of said mobile terminal for accessing said communications network,” as recited in independent claim 25 but states that these features would have been obvious based on the teachings of *Shobatake*.

In particular, the Examiner (at pg. 3 of the Office Action) asserts that:

Shi teaches... wherein said system is adapted to set up at least one connection from at least one of said communications networks to said mobile terminal (figure 1 shows connections between mobile and voice/data networks – see page 6, L20-27 teaching different services/networks too) after said mobile terminal (10) has been identified in at least one address assignment server (or Radius) to which said communications network is going to establish said connection (figure 2 shows mappings while page 11, L21 to page

12, L17 teaches mapping MS/DNS names, also see page 12, L27-34 which teaches using an alternate mapping of IMSI to IP), after checking the existence of a user address of said mobile terminal (figure 2, and pages 11-12 discussed above will verify existence of a user address), after verifying the accessibility to said mobile communications network (page 5, L5-12 teaches adding hosts/terminals to DNS server which reads on verifying accessibility, also see page 7, L12-25 teaches use of DHCP to give/authorize addresses),

but is silent on and after verifying the authorization for receiving incoming calls given by the user of said mobile terminal identified for accessing said communications network.

Shobatake teaches generic mobile/cellular networks (see figures 1 and 3) and communications (e.g., voice/data) and the use of security authorization (eg. AAA):

...

It would have been obvious to one skilled in the art at the time of the invention to modify Shi, such that after verifying the authorization for receiving incoming calls given by the user of said mobile terminal identified for accessing said communications network, to provide means for supporting basic security functions via AAA servers.

Applicant disagrees that the combination of *Shi* and *Shobatake* achieve applicant's system recited in amended independent claim 25.

Shi relates to a method for allocating an address to a mobile station operating in a wireless communication system to facilitate a single communication link between the mobile station and a fixed communication system. In particular, *Shi* (pg. 1, lines 8-10) states that the "invention relates to the allocation of addresses to communication units in order for data to be subsequently routed to such units". *Shi* thus teaches data transfer across communications networks, i.e., both a fixed communication network and a mobile communication network, using TCP/IP protocol, where the mobile station operates in a wireless communication system. However, *Shi* fails to teach or suggest a system that is "configured to set up at least one additional connection from at least one of said communications networks to said mobile terminal after said mobile terminal has sent a first command message to request identification of said

mobile terminal from an application server to at least one domain name server disposed in said communications network,” as recited in amended independent claim 25.

Shi (pg. 12, lines 8-11; FIG. 1) teaches that “[w]hen Domain Name (DN) address is used to identify a MS 40 in an Internet-initiated service situation, the Internet Host 12 (service initiator) needs to perform a DNS lookup to obtain the IP address of the MS 40”. *Shi* (pg. 12, lines 12-13) further explains that “[t]he query is performed by DNS servers”. *Shi* (pg. 12, lines 13-17) additionally explains that “the Internet Host 12 requests an IP address that corresponds to the MS’s domain name from global DNS 14 then provides the corresponding IP address from its mapping table 28 to the Internet Host 12 via global DNS 14”. *Shi* thus merely teaches the reception of address mapping from a fixed network to allocate an address, as well as a method for facilitating and initiating a communication link to the fixed network. However, in such a scenario, before any IP packets are sent to the mobile station, the Internet Host 12 is required to allocate a dynamic IP address to the mobile station (MS) to identify the MS. This allocation of a dynamic IP address is merely the basic, old and well-known requirement for establishing a single communication link between a device (i.e., the MS) and a network before IP packets (i.e., data) can be sent to the MS.

In the claimed system, however, the mobile terminal is already connected to a communications network. Thus, an address of the mobile terminal already exists, and there is a desire to refrain from issuing a second address for the mobile terminal. Consequently, the claimed “system is configured to set up at least one additional connection from at least one of said communications networks to said mobile terminal after said mobile terminal has sent a first command message to request identification of said mobile terminal from an application server to at least one domain name server disposed in said communications network”, while ensuring that another IP address is not provided by another communications network when another connection

is established from the additional communications network to the mobile terminal. That is, the claimed invention advantageously prevents the assignment of another IP address by the communications network for the second connection. *Shi* fails to teach or suggest a system that captures this advantageous feature.

Shobatake, on the other hand, relates to “a system and method for communicating across various communications platforms” (see Abstract). *Shobatake* (col. 3, lines 64-66) describes the use of a unified mobility manager to register the location of a terminal with its home database in a foreign network. *Shobatake* (col. 3, line 66 thru col. 4, line 3) additionally describes that “the terminal may be found through interactions with its home database” and that “[f]urther, authentication, authorization, and accounting may be performed for a terminal outside its home network through accessing its home database”. However, there is nothing whatsoever in *Shobatake* with respect to a system that is “configured to set up at least one additional connection from at least one of said communications networks to said mobile terminal after said mobile terminal has sent a first command message to request identification of said mobile terminal from an application server to at least one domain name server disposed in said communications network”, as recited in amended independent claim 25.

The combination of the cited art thus fails to teach or suggest a system that could achieve the foregoing advantages that are encompassed by the system recited in independent claim 25.

In view of the foregoing, amended independent claim 25 is patentable over the combination of *Shi* and *Shobatake* for at least this reason. Withdrawal of the rejection under 35 U.S.C. §103(a) is therefore requested, and a notice to that effect is earnestly solicited.

Dependent Claims

In view of the patentability of independent claims 25 and 34, for at least the reasons presented above, each of dependent claims 26-33 and 34-41 is believed to be patentable therewith over the prior art. Each of dependent claims 26-33 and 34-41 additionally includes features that serve to still further distinguish the claimed invention over the applied art.

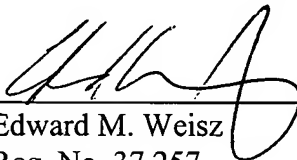
Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

Respectfully submitted,
COHEN PONTANI LIEBERMAN & PAVANE LLP

By



Edward M. Weisz
Reg. No. 37,257
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

Dated: February 25, 2008